

Air Quality Permitting Technical Memorandum

April 9, 2003

TIER II Operating Permit and Permit to Construct No. T2-010511

BRIGHAM YOUNG UNIVERSITY IDAHO REXBURG, IDAHO

AIRS Facility No. 065-00011

Prepared By:

Kent Berry Environmental Quality Management, Inc.

Updated By:

Mike Simon Permit Coordinator

FINAL

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ACRONYMS, UNITS AND CHEMICAL NOMENCLATURE

acfm actual cubic feet per minute
AFS AIRS Facility Subsystem

AIRS Aerometric Information Retrieval System

CFR Code of Federal Regulations

CO carbon monoxide

DEQ Idaho Department of Environmental Quality

dscf dry standard cubic feet

EPA Environmental Protection Agency

gr grain (1 lb = 7,000 grains)
HAPs Hazardous Air Pollutants

IDAPA A numbering designation for all administrative rules in Idaho promulgated in

accordance with the Idaho Administrative Procedures Act

kW Kllowatt

lb/hr pound per hour

MACT Maximum Available Control Technology

MMBtu million British thermal units

NESHAP Nation Emission Standards for Hazardous Air Pollutants

NO₂ nitrogen dioxide NO_x nitrogen oxides

NSPS New Source Performance Standards

PM particulate matter

PM₁₀ particulate matter with an aerodynamic diameter of 10 micrometers or less

PSD Prevention of Significant Deterioration

PTC permit to construct scf standard cubic feet SIP State Implementation Plan

State implementatio

SO₂ sulfur dioxide T/yr tons per year

UTM Universal Transverse Mercator VOC volatile organic compound

PURPOSE

The purpose for this memorandum is to satisfy the requirements of the *Rules for the Control of Air Pollution in Idaho* IDAPA 58.01.01, Sections 200 and 404, et seq., for issuing Permits to Construct and Tier II operating permits.

PROJECT DESCRIPTION

Brigham Young University Idaho (BYU Idaho) requested renewal of Tier II operating permit 065-00011, originally issued to Ricks College on August 12, 1996. A new gas and oil fired boiler has been added without a PTC and an existing coal fired boiler has been shut down. The PTC requirements of IDAPA 58.01.01.200 et. seq. have been incorporated into this permit for the new boiler.

The emission sources covered by the permit are as follows:

Table 1.1 REGULATED EMISSION SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Boiler No.2, Erie City Iron Works Model 16792 H.S.B, stoker coal-fired, 26.7 MMBtu/hr, installed 1963	Multi-clone
3	Boiler No.3, Union Iron Works Model 234-28, stoker coal fired, 40 MMBtu/hr, installed 1966	Mułti-clone
3	Boiler No.4, Keeler Watertube MK, stoker coal fired, 46.7 MMBtu/hr, installed 1973	Multi-clone
3	Boiler No.5, Indeck/Volcano 02-40-X, gas and No.2 oil fired (transition fuel), 51.0 MMBtu/hr on gas, 48.25 MM Btu/hr on oil, installed 2001	None
4	Emergency Generator No.429, Cummins Model NTA 855GS2, diesel fired, 300 kW, located in heating plant	None
4	Emergency Generator No.434, Onan Model 30 DDa, diesel fired, 30 kW, located in physical plant, Building 83	None
4	Emergency Generator No.442, Kohler 60ROZ5, diesel fired, 60 kW, located at Manwaring Center, Building No.7	None
4	Emergency Generator No.473, Kohler Model 20R0P81, diesel fired, 20 kW, located at Kirkham, Building No.3	None
4	Emergency Generator No.477, Generac diesel fired, 100 kW, located at Hart, Building No.9	None
4	Emergency Generator No.479, Kohler Model 30R081, diesel- fired, 30 kW, located at auxiliary services, Building No.90	None
4	Emergency Generator No.423, Onan Model RDJC-4R/14AD, diesel fired, 15 kW, located at Austin, Building No.10	None
4	Emergency Generator No.404, Onan Model DVA-15R/29163A, diesel fired, 50 kW, located at Romney, Building No.5	None
4	Emergency Generator No.431, Kohler 60ROZJ71 diesel fired, 80 kW, located at the library, Building No.4	None
4	Emergency Generator No.413, Onan Model DDA-15R/21694D, diesel fired, 30 kW, located at Benson, Building No.11	None
4	Emergency Generator No.480, Olympian Model 94A3525-S, diesel fired, 60 kW, located at Smith, Building No.8	None
4	Emergency Generator No.401, Generac 176919010, diesel fired, 15 kW, located at Clark, Building No.6	None
4	Emergency Generator No.403, Onan Model DDA-15R/18796D, dieseł fired, 30 kW, located at Snow, Building No.12	None
4	Emergency Generator 447, Cummins, diesel fired, 250 kW, portable	None
4	Emergency Generator AOE, Caterpillar Model 4Z03819, diesel- fired 438 kW, located at Kimball Building	None
4	Emergency Generator AlW, Generac 176919019, diesel-fired 40 kW, located at Radio Graphic Services	None
5	Ash handling system	Baghouse

FACILITY DESCRIPTION

The air emission sources at BYU Idaho consists of 3 coal-fired boilers, a new oil and gas-fired boiler, and 13 emergency generators as listed in Table 1.1.

SUMMARY OF EVENTS

September 24, 2001	BYU Idaho requested renewa	and changes to Ti	er II Operating Permit No.
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065-00011, issued on August 12, 1996, to Ricks College.

February 15, 2002 DEQ determined the application to be incomplete.

March 29, 2002 BYU Idaho submitted a response to the incompleteness determination.

April 22, 2002 DEQ determined the application complete.

October 28, 2002 DEQ issued a draft permit for facility review.

December 2, 2002 A meeting was held between DEQ and BYU-Idaho to discuss outstanding

issues on the facility draft permit.

February 14, 2003 DEQ issued a proposed permit for public comment.

February 26 - March 31

2003 A 30 day public comment period was held. No comments were received.

PERMIT HISTORY

The following is a summary of the permit files available to Environmental Quality Management.

September 4, 1990 A PTC was issued for 4 coal-fired boilers to Ricks College.

August 12, 1996 The original Tier II operating permit was issued to Ricks College.

DISCUSSION

1. Emission Estimates

Potential emission estimates for all the current equipment, using the latest EPA emission factors and operating limits in the permit, are presented in Appendix A.

2. Modeling

The addition of Boiler No. 5 triggers the requirement for a dispersion modeling analysis to demonstrate compliance with the NAAQS and TAPs that exceeded the emission screening levels (ELs) in IDAPA 58.01.01.585 and 586. Because the facility requested relief from the requirement to conduct and submit this analysis, a modeling analysis using the ISC PRIMME model was conducted by Environmental Quality Management, Inc. (EQ). As discussed in Appendix B and Section 6 below, the modeling resulted in the addition of several permit conditions to ensure compliance with the NAAQS for SO₂ and PM₁₀.

3. Facility Classification

BYU Idaho is not a major facility as defined in IDAPA 58.01.01.008. This AIRS classification for this facility is SM, which is defined as a synthetic minor facility with actual and potential emissions of regulated air pollutants below major source thresholds only if it complies with the federally enforceable conditions in this permit.

Area Classification 4.

BYU Idaho is located in Rexburg in Madison County, Idaho, which is in Air Quality Control Region 61. Madison County is designated as attainment or unclassified for all criteria air pollutants.

5. Regulatory Review

Permit to Construct Required IDAPA 58.01.01.201

This project involves the addition of Boiler No. 5. This modification triggers permit to construct requirements and is incorporated into this permit.

Demonstration of Preconstruction Compliance with Toxic Standards IDAPA 58.01.01.210

The addition of Boiler No. 5 requires a TAP analysis for this source. The emission screening levels (ELs) in IDAPA 58.01.01.585 and 586 were exceeded for five TAP's: formaldehyde and five metals. A modeling analysis was conducted for these pollutants as discussed in Section 2. The analysis demonstrates that Boiler No. 5 complies with the toxic standards specified in IDAPA 58.01.01.585 and 586. It should be noted that the total impact of the facility, including the non-modified existing coal-fired boilers, exceeds the AACC for arsenic and chromium +6. Details of the analysis can be found in Appendix B.

Tier II Operating Permit IDAPA 58.01.01.401 thru 470_

BYU Idaho located in Rexburg, Idaho, operates under a Tier II operating permit number 065-00011 originally issued to Ricks College. This permit was originally issued on August 12, 1996 and expired on August 12, 2001. This action is for the modification and renewal of this operating permit.

Ambient Air Quality Standards for Specific Air Pollutants IDAPA 58.01.01.577

As discussed in Section 2, a modeling analysis was conducted for Boilers 2-5 and Emergency Generator No. 1 which demonstrated compliance with the National Ambient Air Quality Standards (NAAQS).

Prevention of Significant Deterioration (PSD) 40 CFR 52

PSD requirements do not apply to BYU Idaho because it is not a major facility as defined in IDAPA 58.01.01.008.10.

New Source Performance Standards (NSPS) 40 CFR 60

The NSPS for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) is applicable to Boiler No. 5.

National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 61 & 63

& Maximum Achievable Control Technology (MACT)

No subparts of 40 CFR 61 or 63 are applicable to units at BYU Idaho.

6. Permit Requirements

Because of the addition of Boiler No. 5, which emits SO₂ from the combustion of oil, the allowable emissions and coal consumption limits for the remaining coal-fired boilers were reduced to maintain the facility's SM status. The individual boiler emission limits were replaced with a single emission limit for all boilers. Compliance with the boiler emission limits (except for particulate matter (PM)) will be insured by compliance with the coal consumption limit, the coal and oil sulfur limits, and the limit on operating hours while burning fuel oil in Boiler No. 5.

The monitoring, recordkeeping and reporting requirements from the original Tier II permit have generally been retained, with the addition of requirements specified in 40 CFR 60, Subpart Dc for Boiler No. 5. Emission limits have been set only for those pollutants whose potential emissions exceed 10% of the significant emission rates at IDAPA 58.01.01.006.92.

The frequency of the PM source tests for the coal-fired boilers has been changed to be a function of how close to the emission standard the boiler was in the previous test. For example, if the grain loading in the previous test was less than 75% of the standard, a subsequent test is required within the next five years. If the grain loading was greater than 90 percent of the standard, a subsequent test is required within the next 12 months. Because the last test on the boilers in February 2000 indicated that emissions were less than 75% of the grain-loading standard of 0.1 gr/dscf for each boiler, the next test is not required until 2 years from the date of this permit.

As discussed in Appendix B, it was necessary to add several conditions to ensure attainment of the NAAQS for PM₁₀ and SO₂. Based on the modeling analysis, conditions have been added to require that the coal boiler stacks be increased to 80 feet above grade. The permit includes a compliance schedule which requires the completion of the stack height increase no later than three years after issuance of the final permit.

7. AIRS Information

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS	NESHAP	MACT	TITLE	AREA CLASSIFICATION
POLLUTANT			(Part 60)	(Part 61)	(Part 63)	V	A – Attainment U – Unclassifiable N – Nonattainment
SO ₂	SM						Α
NO _x	SM						U
со	SM						C
PM ₁₀	SM						U
PT (Particulate)	SM						Α
VOC	В						Ü
THAP (Total HAPs)	NA						NA
	•		API	PLICABLE SUE	3PART		
			Dc				

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.

SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.

FEES

Fees apply to this facility in accordance with IDAPA 58.01.01.470 because the original application for renewal was received 10/4/01, well before the new fee structure was effective on July 1, 2002. BYU-Idaho will be required to pay the Tier II fee applicable at the time the application was submitted which is \$500.00.

RECOMMENDATION

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue a final Tier II operating permit and permit to construct to BYU Idaho. An opportunity for public comment on the air quality aspects of the proposed permit was provided in accordance with IDAPA 58.01.01.404.01.c and no comments were received.

KB/MS:sm Permit No. T2-010511 G:\Air Quality\Stationary Source\SS Ltd\T2\BYU-Idaho\Final Prep\T2-010511 BYU Flnal TM.doc

cc: Jorge Garcia, Idaho Falls Regional Office

APPENDIX A POTENTIAL EMISSION ESTIMATES

									GRAND TOTAL **	# 5 TOTAL	# 5 (Fuel Oil)*	#5 (Nat. Gas)	# 4 TOTAL	# 4 (Coal)	#3 TOTAL	# 3 (Coal)	# 2 TOTAL	#2 (Coal)		Source ID	
(if no emis	** For hourly	J	2. PM10/PN	Coal Emi	Fuel Oil B	1. Natural G	* Fuel oil us		**		48.3	51.0		46.7		40.0		26.7	(MMBtu/hr)	Capacity	Rated
ssion factors	rates Boilers	Exceeds em	A ratio for spr	ssion Factor	mission Fac	as Emission	age restricte					5.00E-02			i				(MMscf/hr)	acity	ted
(if no emission factors available for coal then Boiler #5 total used for worst cas	** For hourly rates Boilers 2, 3, and 4 only - worst case per permit limits	Exceeds emission screening level	PM10/PM ratio for spreader stoker with multiclone = 0.65 (AP-42 Table 1.1-9)	Coal Emission Factors per 5th Edition AP-42, 1.1 Bituminous and Subbituminous Coal Combustion (9-98)	Fuel Oil Emission Factors per 5th Edition AP-42, 1.3 Fuel Oil Combustion (9-98)	. Natural Gas Emission factors per 5th Edition AP-42, 1.4 Natural Gas Combustion (7-98)	Fuel oil usage restricted to 400 hr/yr				3.45E-01								MMBtu/hr) (MMscf/hr) (1000 gal/hr)	Rate	Fuel
oal then Bo	nly - worst c	ng level	vith multiclo	n AP-42, 1	dition AP-42	n Edition AF		0000	8300					3418		2929		1953	(ton/yr)	Z.	Coal
iler #5 total	ase per per		ne = 0.65 (.1 Bitumino	., 1.3 Fuel C	3-42, 1.4 Na								1.87E+00 Coal		1.60E+00		1.07E+00 Coal	(ton/hr)	Rate	bal
used for wo	mit limits		AP-42 Table	us and Sub	Dil Combust	itural Gas C					Fuel Oil	Nat. Gas		Coal		Coal		Coal		Туре	Fuel
orst case)			9 1.1-9)	bituminous Co	ion (9-98)	combustion (7					400	8360		1831		1831		1831	(hr/yr)	Hours	Operating
				oal Combusti		-98)					0.05	0.015		0.1		0.1		0.1	(gr/dscf)	Loading	Grain
				on (9-98)							18000	18000		16000		16000		8500	(dscfm)	Rate	Flow

)ΤΔΙ **	# 5 TOTAL 2.	# 5 (Fuel Oil)* 1		# 5 (Nat. Gas) 2	# 4 / C/AL		# 4 (Coal) 1	# 3 TOTAL 1.	# 3 (Coal) 1.	# Z IOIAL			Source ID		
Cherian II	1						3 47E+01	2.31E+00	1.14E+00		2.31E+00	7.3/6707	375-04	1.37E+01	1.37E+01	1.37E+01	1.285700	795+00	(ID/TH/)	3	-	
		;	1		# **		30 €	2.31E+Q0	1.14Eւ0	-	2.31E+00	0.975	0041120	8.91E+0C	8.91E+00)	8.91E+00	4.746.500	4.4	(MA/GI)		בייונים	
Post in	 ***	Linguistics.		:			1 03E+02	1.96E+01	1.96E+01	100	3.00E-02	4.60		4.26E+01	3.65E+01	3.65E+01	7.400	2.435101	(ID/Dr)	(T. /L.)	3	Pole:
						!	2.75E-01	2.75E-01	6.90E-02	:	2.75E-01	0.00	O DOETOD	0.00E+00	0.00E+00	0.00E+00	0.000	0.000	(ID/III)	(F. P.)	Š	Pole: all mounty Entissions
							4.99E+01	6.90E+00	6.90E+00		2.50€+00		2 05月+01	2.05E+01	1./6E+01	1.76E+01		1.170101	(10/11)	(IF /Fr)	S	
							2.27E+01	4.20E+00	1.73E+00		4.20E+00		0375+00	9.33E+00	8.001	8.00E+00	0.000	S SOLLOO	(III)		CO	
							9.41E-05	3.49E-05	2.09E-05		3.49E-05		36⊑-02	ى 88E-05	3.32E-05	3.32E-05		2 24 = 05	2 24 5 05		PAH	

1.68E-04	1.09E-03	1.30E-01	3.04E-04	3.90E-04	1.09E-03	4.26E-04	5.89E-03	GRAND TOTAL**
3.76E-05	2.14E-03	1.30E-01	9.00E-02	3.90E-04	1.14E-02	2.19E-05	1.05E-04	#5 TOTAL
3.76E-05	2.14E-03	0.00E+00	0.00E+00	3.90E-04	1.14E-02	2.19E-05	7.38E-05	#5 (Fuel Oil)*
1					() ()	0.00		7 0 (140t; Coo)
0.00E+00	1.70E-04	1.30E-01	9.00E-02	0.00E+00	3 75F-03	0.00=+00	1 055-04	#5 (Nat Gas)
6.91E-05	4.48E-04	0.00E+00	1.25E-04	0.00E+00	4.48E-04	1.75E-04	2.43E-03	# 4 TOTAL
6.91E-05	4.48E-04	0.00€+00	1.25E-04	0.00E+00	4.48E-04	1.75E-04	2.43E-03	#4 (Coal)
							!	
5.92E-05	3.84E-04	0.00€+00	1.07E-04	0.00E+00	3.84E-04	1.50E-04	2.08E-03	#3 TOTAL
5.92E-05	3.84E-04	0.00E+00	1.07E-04	0.00E+00	3.84E-04	1.50E-04	2.08E-03	#3 (Coal)
3.95E-05	2.56E-04	0.00€+00	7.15E-05	0.00E+00	2.56E-04	1.00E-04	1.39E-03	#2 TOTAL
3.95E-05	2.56E-04	0.00€+00	7.15E-05	0.00E+00	2.56E-04	1.00E-04	1.39E-03	# 2 (Coal)
(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	
o-Xylene	Toluene	Pentane	Hexane	Napthalene	Formaldehyde	Ethylbenzene	Benzene	Source ID
			y Emissions	Potential Hourly Emissions				

GRAND TOTAL**	# 5 TOTAL	# 5 (Fuel Oil)*	# 5 (Nat. Gas)	# 4 TOTAL	# 4 (Coal)	# 3 TOTAL	# 3 (Coal)	# 2 TOTAL	# 2 (Coal)		Source ID	
2.28E-02	1.93E-04	1.93E-04	1.00E-05	9.40E-03	9.40E-03	8.06E-03	8.06E-03	5.37E-03	5.37E-03	(lb/hr)	Arsenic	_
1.45E-04	1.45E-04	1.45E-04	6.00E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	(lb/hr)	Beryllium	
1.81E-03	1.45E-04	1.45E-04	5.50E-05	7.47E-04	7.47E-04	6.40E-04	6.40E-04	4.27E-04	4.27E-04	(lb/hr)	Cadmium	
#VALUE!	1.45E-04	1.45E-04	7.00E-05	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	(lb/hr)	Chromium	:
#VALUE!	4.35E-05	4.35E-05	2.10E-05	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	(lb/hr)	Chromium+6	
4.20E-06	4.20E-06	0.00E+00	4.20E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	(lb/hr)	Cobalt	
2.90E-04	2.90E-04	2.90E-04	4.25E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00€+00	0.00E+00	(lb/hr)	Copper	Potential Hourly Emissions
2.87E-02	4.35E-04	4.35E-04	0.00E+00	1.18E-02	1.18E-02	1.01E-02	1.01E-02	6.76E-03	6.76E-03	(lb/hr)	Lead	ty Emissions
2.90E-04	2.90E-04	2.90E-04	1.90E-05	0.00E+00	0.00€+00	0.00E+00	0.00€+00	0.00E+00	0.00E+00	(lb/hr)	Manganese	
1.45E-04	1.45E-04	1.45E-04	1.20E-05	0.00E+00	0.00ਜ਼+00	0.00E+00	0.00E+00	0.00€+00	0.00E+00	(lb/hr)	Mercury	

Source ID	Nickel	Selenium	Vanadium	Zinc
	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)
# 2 (Coal)	0.00E+00	0.00€+00	0.00€+00	0.00E+00
# 2 TOTAL	0.00E+00	0.00E+00	0.00E+00	0.00E+00
# 3 (Coal)	0.00€+00	0.00E+00	0.00E+00	0.00€+00
#3 TOTAL	0.00E+00	0.00E+00	0.00E+00	0.00E+00
			3	221
# 4 (Coal)	0.00E+00	0.00E+00	0.00E+00	0.00€+00
# 4 TOTAL	0.00E+00	0.00E+00	0.00E+00	0.00€+00
#5 (Nat Gas)	1 055-04	1 205-06	1 15F-04	1.45E-03
# 5 (Fuel Oil)*	1.45E-04	7.25E-04	0.00€+00	1.93E-04
#5TOTAL	1.45E-04	7.25E-04	1.15E-04	1.45E-03
GRAND TOTAL**	1.45E-04	7.25E-04	1.15E-04	1.45E-03
i i				

GRAND TOTAL**	# 5 TOTAL	# 5 (Fuel Oil)*	# 5 (Nat. Gas)	# 4 TOTAL	# 4 (Coal)	#3 TOTAL	# 3 (Coal)	# 2 TOTAL	# 2 (Coal)		Source ID	
4.17E+01	9.90E+00	2.28E-01	9.67E+00	1.26E+01	1.26E+01	1.26E+01	1.26E+01	6.67E+00	6.67E+00	(ton/yr)	PM	
3.06E+01	9.90E+00	2.28E-01	9.67E+00	8.16E+00	8.16E+00	8.16E+00	8.16E+00	4.34E+00	4.34E+00	(ton/yr)	PM10	
9.87E+01	4.04E+00	3.92E+00	1.25E-01	3.90E+01	3.90E+01	3.34E+01	3.34E+01	2.23E+01	2.23E+01	(ton/yr)	SO ₂	Potenti
1.16E+00	1.16E+00	1.38E-02	1.15E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	(ton/yr)	Voc	Potential Annual Emissions
5.75E+01	1.18E+01	1.38E+00	1.05E+01	1.88E+01	1.88E+01	1.61E+01	1.61E+01	1.07E+01	1.07E+01	(ton/yr)	NO.	ions
3.87E+01	1.79E+01	3.45E-01	1.76E+01	8.55E+00	8.55E+00	7.32E+00	7.32E+00	4.88E+00	4.88E+00	(ton/yr)	8	
2.36E-04	1.50E-04	4.18E-06	1.46E-04	3.55E-05	3.55E-05	3.04E-05	3.04E-05	2.03E-05	2.03E-05	(ton/yr)	PAH	

Potential Emissions from Boilers BYU - Idaho

GRAND TOTAL**	#5TOTAL	#5 (Fuel Oil)*	#5 (Nat. Gas)	# 4 TOTAL	# 4 (Coal)	#3 TOTAL	#3 (Coal)	#2 TOTAL	# 2 (Coal)		Source ID	
5.85E-03	4.54E-04	1.48E-05	4.39E-04	2.22E-03	2.22E-03	1.90E-03	1.90E-03	1.27E-03	1.27E-03	(ton/yr)	Benzene	
3.95E-04	4.39E-06	4.39E-06	0.00E+00	1.61E-04	1.61E-04	1.38E-04	1.38E-04	9.18E-05	9.18E-05		Ethytbenzene	
1.89E-02	1.80E-02	2.28E-03	1.57E-02	4.10E-04	4.10E-04	3.52E-04	3.52E-04	2.34E-04		(ton/yr)	Formaldehyde	
7.80E-05	7.80E-05	7.80E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00€+00	(ton/yr)	Napthalene	Potential Annual Emissions
3.76E-01	3.76E-01	0.00E+00	3.76E-01	1.15E-04	1.15E-04	9.81E-05	9.81E-05	6.54E-05	6.54E-05	(ton/yr)	Hexane	al Emissions
5.43E-01	5.43E-01	0.00E+00	5.43E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00€+00	(ton/yr)	Pentane	
2.13E-03	1.14E-03	4.28E-04	7.11E-04	4.10E-04	4.10E-04	3.52E-04	3.52E-04	2.34E-04	2.34E-04	(ton/yr)	Toluene	
1.61E-04	7.52E-06	7.52E-06	0.00E+00	6.32E-05	6.32E-05	5.42E-05	5.42E-05	3.61E-05	3.61E-05	(ton/yr)	o-Xylene	

GRAND TOTAL**	# 5 TOTAL	# 5 (Fuel Oil)*	# 5 (Nat. Gas)	# 4 TOTAL	# 4 (Coal)	# 3 TOTAL	# 3 (Coal)	# 2 TOTAL	# 2 (Coal)		Source ID	
2.10E-02	8.04E-05	3.86E-05	4.18E-05	8.61E-03	8.61E-03	7.38E-03	7.38E-03	4.92E-03	4.92E-03	(ton/yr)	Arsenic	
3.15E-05	3.15E-05	2.90E-05	2.51E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	(ton/yr)	Beryflium	
1.92E-03	2.59E-04	2.90E-05	2.30E-04	6.84E-04	6. 84 E-04	5.86E-04	5.86E-04	3.91E-04	3.91E-04	(ton/yr)	Cadmium	
#VALUE!	3.22E-04	2.90E-05	2.93E-04	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	(ton/yr)	Chromium	
#VALUE!	9.65E-05	8.69E-06	8.78E-05	#VALUE!	#VALUE!	#VALUEI	#VALUE!	#VALUE!	#VALUE!	(ton/yr)	Chromium+6	
1.76E-05	1.76E-05	0.00E+00	1.76E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	(ton/yr)	Cobalt	
2.36E-04	2.36E-04	5.80E-05	1.78E-04	0.00E+00	0.00E+00	0.00E+00	0.00€+00	0.00E+00	0.00E+00	(ton/yr)	Copper	Potential Annual Emissions
2.64E-02	8.69E-05	8.69E-05	0.00E+00	1.08E-02	1.08E-02	9.28E-03	9.28E-03	6.19E-03	6.19E-03	(ton/yr)	Lead	al Emissions
1.37E-04	1.37E-04	5.80E-05	7.94E-05	0.00€+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00€+00	(ton/yr)	Manganese	
7.91E-05	7.91E-05	2.90E-05	5.02E-05	0.00E+00	0.00E+00	0.00€+00	0.00E+00	0.00E+00	0.00E+00	(ton/yr)	Mercury	

Potential Emissions from Boilers BYU - Idaho

Source ID	Nickel	Selenium	Vanadium	Zinc
	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
# 2 (Coal)	0.00E+00	0.00E+00	0.00E+00	0.00E+00
# 2 TOTAL	0.00E+00	0.00€+00	0.00€+00	0.00E+00
#3 (Coal)	0.00E+00	0.00E+00	0.00E+00	0.00E+00
#3 TOTAL	0.00E+00	0.00E+00	0.00E+00	0.00E+00
# 4 (Coal)	0.00E+00	0.00E+00	0.00E+00	0.00E+00
# 4 TOTAL	0.00E+00	0.00E+00	0.00E+00	0.00E+00
# 5 (Nat. Gas)	4.39E-04	5.02E-06	4.81E-04	6.06E-03
#5 (Fuel Oil)*	2 90F-05	1 45E-04	0.00=+00	3 865-05
#5TOTAL	4.68E-04	1.50E-04	4.81E-04	6.10E-03
GRAND TOTAL**	4.68E-04	1.50E-04	4.81E-04	6.10E-03
		:		

Boiler Emission Factors BYU - Idaho

Boiler Type	PM ₁₀	SO ₂	VOC	NO.	8	PAH
Natural gas-fired (lb/MMscf)		0.6	5.5	50	84	6.98E-04
Fuel oil-fired (lb/1000 gal)	3.3	56.8	0.2	20	5	6.06E-05
(lb/10 ¹² Btu)						
Coal-fired (lb/ton)		22.8	0	11	5	2.08E-05
(lb/10 ¹² Btu)**						
	Sulfur content of fuel oil =	t of fuel oil =		0.4 %	%	
	Sulfur content of coal =	t of coal =		0.6 %	%	
	1. Natural Gas Emission factors per 5th Edition AP-42, 1.4 Natural Gas Combu	as Emission for	actors per 5th	Edition AP-4:	2, 1.4 Natural	Gas Combus
	Fuel Oil Er	nission Facto	rs per 5th Ed	tion AP-42, 1	Fuel Oil Emission Factors per 5th Edition AP-42, 1.3 Fuel Oil Combustion (9-	mbustion (9-
	Coal Emis	sion Factors	per 5th Edition	1 AP-42, 1 1 E	Coal Emission Factors per 5th Edition AP-42, 1.1 Bituminous and Subbitumin	d Subbitumin
	2. PM10/PM ratio for spreader stoker with multiclone = 0.65 (AP-42 Table 1.1-9	ratio for sprea	ader stoker w	th multiclone	= 0.65 (AP-4;	? Table 1.1-9

Boiler Emission Factors BYU - Idaho

				Emissio	Emission Factors ¹			
Boiler Type	Benzene	Ethylbenzene Formaldehyde	Formaldehyde	Napthalene	Hexane	Pentane	Toluene	o-Xylene
Natural gas-fired (lb/MMscf)	2.10E-03	0.00E+00	7.50E-02	0.00E+00	1.80E+00	2.60E+00	3.40E-03	0.00E+00
							į	
Fuel oil-fired (lb/1000 gal)	2.14E-04	6.36E-05	3.30E-02	1.13E-03	0.00E+00	0.00E+00	6.20E-03	1.09E-04
(lb/10 ¹² Btu)								
Coal-fired (lb/ton)	1.30E-03	9.40E-05	2.40E-04	0.00E+00	6.70E-05	0.00E+00	2.40E-04	3.70E-05
(lb/10 ¹² Btu)**								
	ition (7-98)							
	98)							
	ous Coal Com	ous Coal Combustion (9-98)						

Boiler Emission Factors BYU - Idaho

					1		Emission Factors	actors		
Boiler Type	Arsenic	Beryllium	Cadmium	Total	Chromium	Cobalt	Copper	<u>a</u> .	Manganese	Mercury
				Chromium	÷6*					
Natural gas-fired (lb/MMscf)	2.00E-04	1.20E-05	1.10E-03	1.40E-03	4.20E-04	8.40E-√5	8.50E-04	0.00E+00	3.80E-04	2.40E-04
						L.				
Fuel oil-fired (lb/1000 gal)						} 5. ¥				
(lb/10 ¹² Btu)	4	ယ	သ	ယ	0.9	0	6	9	6	3
Coal-fired (lb/ton)						1 93.				
(lb/10 ¹² Btu)**	201.5		16		#VALUE!	,		253.5		
	* Assumes CR+6 is 30% of total chrome per AP-42, Tables 1.1-18 are	₹+6 is 30% o	f total chrome	e per AP-42,	Tables 1.1-1	8 ar : 1.3-11				
	** AP-42, Table 1.1-17 (Uncontrolled spreader stoker - mid-point of call	le 1.1-17 (Un	controlled sp	reader stoke	r - mid-point		ented, assum	le 50% contr	ige presented, assume 50% control by multiclones)	nes)

						1				
				:		T. S				:

Boiler Type	Nickel	Selenium Vanadium	Vanadium	Zinc
Natural gas-fired (lb/MMscf)	2.10E-03	2.40E-05	2.10E-03 2.40E-05 2.30E-03 2.90E-02	2.90E-02
Fuel oil-fired (lb/1000 gal)				
(lb/10 ¹² Btu)	3	15	0	4
Coal-fired (lb/ton)				
(lb/10 ¹² Btu)**				
The state of the s				

		Natural	Fuel	
		Gas	Oil	Coal
		Emission	Emission	Emission
CAS No.	Pollutant	Factor	Factor	Factor
		(lb/MMscf)	(lb/1000 gal)	(lb/ton)
91-57-6	2-Methylnapthalene	2.40E-05		
56-49-5	3-Methylchloranthrene	1.80E-06		
	5-Methyl chrysene			2.20E-0
	7,12-Dimethylbenz(a)anthracene	1.60E-05		
83-32-9	Acenaphthene	1.80E-06	2.11E-05	
203-96-8	Acenaphthylene	1.80E-06	2.53E-07	
120-12-7	Anthracene	2.40E-06	1.22E-06	2.10E-0
56-55-3	Benz(a)anthracene	1.80E-06	4.01E-06	8.00E-0
50-32-8	Benzo(a)pyrene	1.20E-06		3.80E-0
205-99-2	Benzo(b)fluoranthene	1.80E-06	1.48E-06	
191-24-2	Benzo(g,h,i)perylene	1.20E-06	2.26E-06	2.70E-0
205-82-3	Benzo(k)fluoranthene	1.80E-06		
	Biphenyl			1.70E-0
218-01-9	Chrysene	1.80E-06	2.38E-06	1.00E-0
53-70-3	Dibenzo(a,h)anthracene	1.20E-06	1.67E-06	
206-44-0	Fluoranthene	3.00E-06	4.84E-06	
86-73-7	Fluorene	2.80E-06	4.47E-06	
193-39-5	Indeno(1,2,3-cd)pyrene	1.80E-06	2.14E-06	
91-20-3	Naphthalene	6.10E-04		1.30E-0
85-01-8	Phenanathrene	1.70E-05	1.05E-05	2.70E-0
129-00-0	Pyrene	5.00E-06	4.25E-06	3.30E-0
Total PAH		6.98E-04	6.06E-05	2.08E-0

Potential Emissions from Generators BYU - Idaho

	Rated		Operating		Po	tential Hou	Potential Hourly Emissions	S			Po	Potential Ann
Source ID	Capacity		Hours	PM	PM10	SO ₂	Voc	v No	8	PM	PM10	SO_2
	(kw)	(hp)	(hr/yr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(lb/hr)	(ton/yr)	(ton/yr)	(ton/yr)
Diesel Generator 429	300	402	500	0.88	0.88	0.82	1.01	12.46	2.69	0.22	0.22	0.21
Generator 477	100	134	500	0.29	0.29	0.27	0.34	4.15	0.90	0.07	0.07	0.07
Generator AOE	438	438 586.92	500	1.29	1.29	1.20	1.48	18.19	3.92	0.32	0.32	0.30
Misc. Diesel Generators	715	715 958.1	500	2.11	2.11	1.96	2.41	29.70	6.40	0.53	0.53	0.49
TOTAL				4.58	4.58	4.27	5.23	64.51	13.90	1.14	1.14	1.07
EL												
								:				
* New Equipment												
Exceed emission screening level	level											

Potential Emissions from Generators BYU - Idaho

	Rated	ed	Operating	Operating ual Emissions	S	
Source ID	Capacity	acity	Hours	200	NOx	co
	(kw)	(hp)	(hr/yr)	(ton/yr)	(ton/yr)	(ton/yr)
Diesel Generator 429	300	402	500	0.25	3.12	0.67
Generator 477	100	134	500	0.08	1.04	0.22
Generator AOE	438	438 586.92	500	0.37	4.55	0.98
Misc. Diesel Generators	715	958.1	500	0.60	7.43	1.60
TATOT				1.31	16.13	3.48
EL						
* New Equipment						
Exceed emission screening level	level					

Generator Emission Factors BYU - Idaho

al Engines	Diesel Industrial Engines	1. Emission Factors per 5th Edition AP-42, 3.3 Gasoline and Dic	dition AP-42, 3.	ctors per 5th E	1. Emission Fa	
0.00668	0.031	0.0025141	0.00205	0.0022	0.0022	Diesel Fired Emergency Generator
(lb/hp-hr)	(lb/hp-hr)	(lb/hp-hr)	(lb/hp-hr)	(lb/hp-hr)	(lb/hp-hr)	
8	NO _x	ТОС	SO ₂	PM10	PM	Source Type
		Factors ¹	Emission Factors			

Page 1

Generator Emission Factors BYU - Idaho

	Diesel Fired Emergency Generator		Source Type	
	1.68E-04	(lb/MMBtu)	PAH	
	9.33E-04	(lb/MMBtu)	Benzene	
	1.68E-04 9.33E-04 4.09E-04 2.85E-04 2.58E-03	(lb/MMBtu) (lb/MMBtu) (lb/MMBtu) (lb/MMBtu) (lb/MMBtu)	Toluene	
	2.85E-04	(lb/MMBtu)	Xylenes	
	2.58E-03	(lb/MMBtu)	Propylene	Emission Factors
	3.91E-05	(lb/MMBtu)	PAH Benzene Toluene Xylenes Propylene 1,3-Butadiene Formaldehyde Acetaldehyde	Factors ¹
	1.18E-03	(lb/MMBtu)	Formaldehyde	
	7 67E-04	(lb/MMBtu)	Acetaldehyde	

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APPENDIX B REPORT ON DISPERSION MODELING ANALYSIS

REPORT ON MODELING ANALYSIS FOR BYU - IDAHO

1. SUMMARY:

The criteria pollutants covered by the BYU – Idaho permit that are subject to the requirements of modeling were oxides of nitrogen (NO_x), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 μ m (PM_{10}), sulfur dioxide (SO_2), and carbon monoxide (CO). The emission screening levels in IDAPA 58.01.01.586 were exceeded for five (6) toxic air pollutants (TAPs) emitted from Boiler No. 5 (the only new or modified source at the facility that triggers a TAP modeling analysis). Under the permit conditions in the permit, the modeling analysis of criteria pollutants and TAPs demonstrated compliance with the National Ambient Air Quality Standards (NAAQS) and Acceptable Ambient Concentrations for the TAPs for all applicable averaging periods.

2. DISCUSSION:

2.1 Applicable Air Quality Impact Limits

This facility is located in Rexburg, Idaho which is designated an attainment or unclassifiable area for PM_{10} , CO, SO_2 , and NO_x . Therefore, total ambient impacts for these criteria pollutants must be below the NAAQS. The incremental ambient impacts for the TAPs from new or modified sources must be below the acceptable ambient concentrations. The dispersion modeling analysis compared facility impacts (including background concentrations) to the regulatory limits listed in Table 1.

Table 1. Applicable regulatory limits

Pollutant	Averaging Period	Significant Contribution Levels (μg/m³) ^{1, 2}	Regulatory Limit (μg/m³)³
PM ₁₀ ⁴	Annual	1	50
	24-hour	5	150
SO ₂ ⁵	3-hour	25	1,300
-	24-hour	5	365
	Annual	1.0	80
CO ⁶	8-hour	500	10,000
	1-hour	2000	40,000
NO _x ⁷	Annual	1	100
Arsenic	Annual	N/A	0.0023
Beryllium	Annual	N/A	0.0042
Cadmium	Annual	N/A	0.00056
Chromium (VI)	Annual	N/A	0.000083
Nickel	Annual	N/A	0.0042
Formaldehyde	Annual	N/A	0.077

- 1. IDAPA 58.01.01.006.93
- 2. Micrograms per cubic meter
- 3. IDAPA 58.01.01.577 for criteria pollutants and IDAPA 58.01.01.586 for toxic pollutants
- 4. Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers
- 5. Sulfur dioxide
- 6. Carbon monoxide
- 7. Oxides of nitrogen

2.2 Background Concentrations

When conducting NAAQS modeling for non-PSD sources (i.e., BYU), sources not explicitly included in the model are taken into account by adding a background concentration. DEQ provided the ambient air pollutants for the Rexburg area that were used in the calculation of the total NAAQS concentration. Table 2 lists background concentrations provided by DEQ.

Table 2. Ambient Air Background Concentrations

Pollutant	Averaging Period	Background Concentration (μg/m³)
PM ₁₀	Annual	22
,-	24-hour	81
SO ₂	3-hour	42
-	24-hour	26
	Annuai	8
со	8-hour	4,600
	1-hour	13,800
NO ₂	Annual	32

Source: DEQ

2.3 Modeling Impact Assessment

The procedures in the State of Idaho's Air Quality Modeling Guideline (DEQ 2002), as well as the EPA documents Guideline on Air Quality Models (EPA 2001) were followed in conducting the modeling analysis.

The Industrial Source Complex Model (ISC), including the Plume RIse Model Enhancements Model (PRIME), version 99020, was used in the compliance evaluation. All regulatory default options were used in the modeling. The area surrounding the facility within 3 kilometers is rural in nature although incorporated Rexburg is immediately north of the University. Per discussions with the DEQ, rural mixing heights were used in the model.

The remainder of the modeling analysis describes the emission rates, source parameters, building downwash parameters, ambient air boundary, receptor network, elevation data, meteorological data, and compliance evaluation.

Initial dispersion modeling of Boiler No. 5 showed compliance with all regulatory limits for all averaging periods. Because the concentrations modeled with Boiler No. 5 exceeded the significant contribution levels shown in Table 1, a full impact analysis that includes all non-fugitive point sources at the facility was required.

The short-term and annual emissions limits for all non-fugitive point sources at the facility are shown in Table 3. The existing stack parameters for each source are presented in Table 4. As shown in the next section on results, the existing conditions do not meet the NAAQS for short-term averaging times for SO₂ and PM₁₀.

A secondary analysis implementing additional permit conditions was performed to allow compliance with the NAAQS. Based on conversations with BYU – Idaho and successive dispersion modeling runs, two permit conditions would bring the facility into compliance as follows:

- The maximum heat input shall not exceed 113 MMBtu/hr averaged over each calendar day; and
- The minimum stack height on coal-fired boilers No. 2, No. 3, and No. 4 shall be 80 feet above the ground.

Table 3. Short-	· and Long	Short- and Long-term Emissions Used in Modeling for BYU - Idaho Permitting Project	J - Idë	iho Pe	rmittin	g Proje	ict					
Emissions	Source						Formal-		Berylliu		Chrome	
Source	Q	Type of Emissions	PM ₁₀	SO ₂	႘	Ň	dehyde	Arsenic	Ε	Cadmium	>	Nickel
		Modeled Short-Term Emission Rate (lbs/hr)	4.74	24.32	5.33	Ą	Ą	ΑĀ	Ą	AA	Ą	NA
26.67 MMBtu/hr Coal-Fired	Boiler2	Annual Emissions (TPY)	4.34	22.27	4.88	10.74	2.34E- 04	4.92E-03	0	3.91E-04	9.20E-03	0
Boiler #2		Modeled Long-term Emission Rate ^a (lbs/hr)	0.99	5.08	₹	2.45	5.35E- 05	1.12E-03	0	8.92E-05	2.10E-03	0
		Modeled Short-Term Emission Rate (lbs/hr)	8.91	36.48	8.00	ΑĀ	NA	ΝĀ	ΝΑ	NA	ΑN	NA
40 MMBTU/hr Coal-Fired	Boiler3	Annual Emissions (TPY)	8.16	33.40	7.32	16.11	3.52E- 04	7.38E-03	0	5.86E-04	1.38E-02	0
Boiler #3		Modeled Long-term Emission Rate ^a (lbs/hr)	1.86	7.62	¥	3.68	8.03E- 05	1.68E-03	0	1.34E-04	3.15E-03	0
		Modeled Short-Term Emission Rate (lbs/hr)	8.91	42.56	9.33	NA	NA	NA	۷N	۷N	ΑN	A'A
46.67 MMBtu/hr Coal-Fired	Boiler4	Annual Emissions (TPY)	8.16	38.97	8.55	18.80	4.10E- 04	8.61E-03	0	6.84E-04	1.61E-02	0
Boiler #4		Modeled Long-term Emission Rate ^a (lbs/hr)	1.86	8.90	¥	4.29	9.36E- 05	1.97E-03	0	1.56E-04	3.68E-03	0
		Modeled Short-Term Emission Rate (lbs/hr)	2.31	19.60	4.20	٧¥	ΝA	NA	NA	۷N	ΝA	¥
51 MMBtu/hr Natural Gas-	Boiler5	Annual Emissions (TPY)	9.90	4.40	17.90	11.83	1.80E- 02	8.04E-05	3.15E-05	2.59E-04	1.93E-04	4.68E-04
Fired Boiler #5		Modeled Long-term Emission Rate ^a (lbs/hr)	2.26	0.92	NA	2.70	4.10E- 03	1.84E-05	7.19E-06	5.91E-05	4.41E-05	1.07E-04
Diesel. Fired		Modeled Short-Term Emission Rate (lbs/hr)	0.88	0.21	2.69	NA	NA	NA	ΑN	NA	¥.	¥
Emergency	Heat_Gen	Annual Emissions (TPY)	0.22	0.22	0.67	3.12	NA	NA	NA	ΑN	ΝΑ	¥
Generator		Modeled Long-term Emission Rate ^a (lbs/hr)	0.05	0.05	NA	0.71	NA	NA	NA	ΑN	NA	Ą
Diesel-Fired		Modeled Short-Term Emission Rate (lbs/hr)	1.29	0.82	3.92	NA	ΑΝ	AN	¥	Ą	ΑN	ž
Emergency	Kimb_Gen	Annual Emissions (TPY)	0.32	0.30	0.98	4.55	₹	Ą	¥	Ą	Α¥	¥
Generator		Modeled Long-term Emission Rate ^a (lbs/hr)	0.07	0.07	NA	1.04	¥	Ą	¥	AN	NA	Ϋ́
Diesel-Fired		Modeled Short-Term Emission Rate (lbs/hr)	0.29	0.82	06.0	NA	₹	AN	ΑΝ	ΑN	NA	Ϋ́
Emergency	Hart_Gen	Annual Emissions (TPY)	0.07	0.07	0.22	1.04	AA	Ą	ΑΝ	¥	NA	¥
Generator		Modeled Long-term Emission Rate ^a (lbs/hr)	0.02	0.05	ΑN	0.24	NA	NA	NA	¥	NA	ΑN
^a Calculated by	dividing the	Calculated by dividing the annual emissions in pounds by 8760 hours in a year	a yea									

Table 4. Stack Parameters Used in Dispersion Modeling for BYU - Idaho Permitting Project

	Stack	(Height		Flow					
	Existing Height	With Permit Conditions	Diameter	Rate	Flow Rate	Temp.	UTMx	UTMy	Elevation
Source	(ft)	(ft)	(ft)	(scfm)	(acfm)	(°F)	(m)	(m)	(ft)
Boiler5	64	64	3.5	18,000	30,316	300	436,898	4,851,716	4,890
Boiler2	59	80	2.5	8,500	19,027	550	436,871	4,851,715	4,890
Boiler3	59	80	3.17	16,000	35,816	550	436,875	4,851,715	4,890
Boiler4	59	80	3.17	16,000	35,816	550	436,890	4,851,716	4,890
Heat Gen	47	47	0.5	853	2,570	900	436,894	4,851,708	4,890
Kimb Gen	12	12	160 ^b	1,313	3958	1002	437,266	4,851,610	4,963
Hart Gen	6.3	6.3	0.167	83	250	1002	437,008	4,851,994	4,963

- a. Reflects the minimum stack height required by permit conditions on coal-fired boilers No. 2, No. 3, and No. 4.
 - b. Virtual diameter, calculated because source emits horizontally restricting vertical momentum; however, buoyancy flux was assumed to be conserved. The diameter was calculated using the following equation: Virtual diameter = 31.6 * d_s * $v_s^{0.5}$

Where:

 $d_s = actual inside diameter (0.203 m)$

v_s = actual exit velocity (57.7 m/s)

As shown in Table 4, coal-fired boiler stack heights were adjusted to allow minimization of building downwash effects. This was in the form of a permit condition requiring the applicant to raise the coal-fired boilers stacks on No. 2, No. 3, and No. 4 to a minimum height of 80 feet above the base elevation.

The methodology of modeling the short-term averaging periods (i.e., 24 hours or less) was different than annual-averaging period because modeling short-term averaging times was affected by the permit condition that limits BYU – Idaho to 113 MMBtu/hr of heat input averaged over each calendar day. Because operation of all four boilers simultaneously would exceed this permit condition, the three worst boilers were chosen to be modeled. Boilers No. 2, No. 3, and No. 4 were chosen because they would have the highest emissions and worst dispersion parameters compared with the other boiler combinations and still meet the 113 MMBtu/hr permit restriction. Therefore, all short-term averaging times were modeled with the coal-fired Boilers No. 2, No. 3, and No. 4 plus three emergency generators.

The methodology for annual averaging periods assumed operation of all boilers in addition to the three emergency generators for the annual emission rates and the stack parameters as shown in Tables 3 and 4, respectively.

The reasons that the dispersion modeling analysis included the generators at the Heat Plant, Hart building, and Kimball building and not the others were because:

- These three are the largest, except for the portable one, which is 250kW, it was not included because it is not a fixed source.
- The emissions associated with generators less than 100 kW are less significant because their emissions of criteria pollutants are below 1 pound per hour.
- The small generators (< 100 kW) would not likely affect the area of impact.

The physical effluent characteristics of the Kimball Generator was manipulated per DEQ guidance because the hot gases exiting the stack are horizontally emitted. Per DEQ guidance, horizontal releases are assumed to have 0.001 meters per second exit velocity to restrict vertical momentum. Horizontal sources are further modified by calculating a fictitious diameter such that buoyancy flux is conserved. When a hot obstructed source is an issue the exit diameter is adjusted by the following equation to conserve buoyancy:

Virtual diameter = 31.6 * d_s * $v_s^{0.5}$

Where

 d_s = actual inside stack diameter (0.203 m) v_s = actual stack exit velocity (57.73 m/s)

Stack heights, buildings, and other structures were included in the analysis because building downwash of released emissions may influence the plumes (which will tend to bring the plume closer to the ground near the structures). Buildings (and each building's height) used in the downwash calculations were the Heat Plant (39'), Hart (57'), Physical Plant (34'), Rigby (28.5), Physical (34'), Austin (57'), Taylor (51'), Kimball (32), and Bibbulph (28.5') buildings. The elevation and location of each building at the facility was used in the U.S. EPA's Building Profile Input Program-PRIME (95086) to calculate the building downwash parameters.

The ambient air boundary for this project includes areas within the property boundary because public access to the University is unrestricted. All calculations of dispersion modeling impacts occur along or near the outside of this ambient air boundary.

Four sets of Cartesian grids at various spacing were arranged around the facility. One coarse grid was spaced at 500 meters and it extended out to 10,000m from the site. Two fine grids, 100 and 50 meters, of receptors were placed 1,000m and 600m out from the site, respectively. Ambient air boundary receptors spaced at 25m were extended out to 200m from the site. A total of 2,731 receptors were used.

The elevations of each receptor were derived from 30m resolution Digital Elevation Model (DEM) 7.5-minute quadrangle maps for the area.

Per discussions with DEQ, the closest applicable meteorological station to the site is in Pocatello, Idaho. The National Weather Service's (NWS) Pocatello Airport meteorological site collects surface air data. These data were combined with Boise's upper air meteorological data. The most recent 5-year data set was taken from EPA's SCRAM website.

3. MODELING RESULTS FOR CRITERIA POLLUTANTS

The results presented in Table 5 show that the ambient air impacts due to the current facility violate the NAAQS for short-term averaging times for SO_2 and PM_{10} . The primary contributors to these high concentrations are the coal-fired boilers. These significant impacts occur at ground-level receptors in the immediate vicinity of the Heat Plant Building. Under high wind events, the plumes from the coal-fired stacks, in addition to the other stacks, are under the influence of downwash effects. Because the coal-fired boilers stacks are only about 20 feet above the Heat Plant roof, downwash effects and dispersion calculations show increased concentrations at the ground-level receptors compared with similar stacks that are not influenced by building downwash.

Table 6 shows the dispersion modeling concentrations associated with the permit conditions requiring increased stack heights for Boilers No. 2, No. 3, and No. 4 and also, a limit on heat input. As a result of these conditions, BYU – Idaho would meet the NAAQS for all pollutants for all averaging times.

Table 5. NAAQS Impact Analysis With Existing Conditions For BYU – Idaho

Pollutant	Averaging Period	Total Ambient Impact, µg/m³	Ambient Background Concentration, µg/m³	Total NAAQS Concentration, µg/m³	NAAQS, µg/m³	Percent of NAAQS,
COª	1-hour	393	13,800	14,193	40,000	35%
COa	8-hour	330	4,600	4,930	10,000	49%
SO ₂ ^a	3-hour	1,355	42	1,397	1,300	107%
SO ₂ ª	24-hour	1,040	26	1,066	365	292%
SO ₂ °	Annual	63	8	71	80	89%
PM ₁₀ ^b	24-hour	179	81	260	150	173%
PM ₁₀ ^c	annual	15	22	37	50	74%
NO _x c	annual	37	32	69	100	69%

- a. Compliance based on high-second high concentration at each receptor
- b. Compliance based on high sixth high concentration modeled at each receptor with 5 years of meteorological data
- c. Compliance based on maximum concentration at each receptor

Table 6. NAAQS Impact Analysis With Additional Permit Conditions For BYU - Idaho

Pollutant	Averaging Period	Total Ambient Impact, µg/m³	Ambient Background Concentration, µg/m³	Total NAAQS Concentration, µg/m³	NAAQS, μg/m³	Percent of NAAQS,
COª	1-hour	264	13,800	14,064	40,000	35%
COª	8-hour	113	4,600	4,713	10,000	47%
SO ₂ ª	3-hour	511	42	553	1,300	43%
SO ₂ ^a	24-hour	307	26	333	365	91%
SO ₂ °	Annual	13	8	21	80	26%
PM ₁₀ ^b	24-hour	66	81	147	150	98%
PM ₁₀ °	Annual	5	22	27	50	54%
NO _x ^c	Annual	12	32	44	100	44%

Note:

All averaging times reflect the minimum stack height required by permit on coal-fired boilers No. 2, No. 3, and No. 4.

All averaging times of 24-hours or less were modeled with the following permit condition:

The maximum heat input of 113 MMBtu/hr averaged over each calendar day. Because of this permit condition Boilers No. 2, 3, and No. 4 were modeled together at their full heat input with no other boilers in operation. Three emergency generators were included in the modeling runs as well.

- a. Compliance based on high-second high concentration at each receptor
- b. Compliance based on high sixth high concentration modeled at each receptor with 5 years of meteorological data
- c. Compliance based on maximum concentration at each receptor

4. Toxic Air Pollutants

Because Boiler No. 5 is the only new or modified source at the facility, a TAP analysis is only triggered by this source. The maximum annual concentrations were modeled using the emissions shown in Table 3 for six TAPs that exceeded their emission screening levels for Boiler No. 5. The modeling results of Boiler No. 5 are presented in Table 7 and based on this modeling, ambient concentrations for carcinogens due to Boiler No. 5 are acceptable.

As shown in Table 8, dispersion modeling that includes all sources of formaldehyde, arsenic, beryllium, cadmium, chromium (VI), and nickel (as limited by the permit conditions specified in Section 2.3) showed concentrations in excess of the acceptable ambient concentrations for carcinogens (AACC) for arsenic and chromium (VI). As noted above, the authority to ensure compliance with the AACCs is limited to Boiler No. 5.

Table 7. Toxic Impact Analysis of Boiler	r No. 5 For BYU – Idaho
--	-------------------------

Toxic Pollutant	Maximum Concentration (µg/m³)	Averaging Time	IDAPA AACC (µg/m³)	Acceptable?
Formaldehyde	0.004	Annual	0.077	yes
Arsenic	0.00002	Annual	0.00023	yes
Beryllium	0.00001	Annual	0.0042	yes
Cadmium	0.00006	Annual	0.00056	yes
Chromium (VI)	0.00002	Annual	0.000083	yes
Nickel	0.0001	Annual	0.0042	yes

Table 8. Toxic Impact Analysis With Permit Conditions at BYU - Idaho (All Sources)

Toxic Pollutant	Maximum Concentration (µg/m³)	Averaging Time	IDAPA AACC (µg/m³)	Under IDAPA AACC?	Percent of AACC,
Formaldehyde	0.004	Annual	0.077	yes	6%
Arsenic	0.00263	Annual	0.00023	no	1143%
Beryllium	0.00002	Annual	0.0042	yes	0.5%
Cadmium	0.00026	Annual	0.00056	yes	46%
Chromium (VI)	0.00493	Annual	0.000083	no	5940%
Nickel	0.0001	Annual	0.0042	yes	2%

5. REFERENCES:

DEQ, 2002. Idaho Department of Environmental Quality, 2002. State of Idaho Air Quality Modeling Guideline, Boise, Idaho, May.

EPA, 2001. U.S. EPA, 2001. 40CFR51 – Requirements for Preparation, Adoption, and Submittal of State Implementation Plans (Guideline on Air Quality Models).

Example of Short-term Analysis for PM₁₀

```
*** ISC3P - VERSION 99020 ***
*** BYU Max ST ER from Operating Permit BYUSTBACKDEOPM.BST 01/29/03 ***
 *** Model Executed on 01/29/03 at 09:56:16 ***
 BEE-Line ISC3P "BEEST" Version 8.50
 Input File - P:\030000\030192\030192.0016.001\BEEST\Backup Generators\BYUSTBACKUPDEQPM 87 PM_10.DTA
 Output File - P:\030000\030192\030192.0016.001\BEEST\Backup Generators\BYUSTBACKUPDEQPM 87 PM_10.LST
   Met File - P:\030000\030192\030192.0016.001\Met\pocboi8791.asc
      Number of sources -
 Number of source groups -
    Number of receptors -
                                2728
                                                 *** POINT SOURCE DATA ***
             NUMBER EMISSION RATE
                                                              STACK STACK
                                                                               STACK
                                                                                         STACK
                                                                                                  BUILDING EMISSION
                                                     BASE
RATE
   SOURCE
              PART: (GRAMS/SEC)
                                     х
                                              Y
                                                     ELEV.
                                                              HEIGHT TEMP. EXIT VEL. DIAMETER EXISTS SCALAR
VARY
                                  (METERS) (METERS) (METERS) (DEG.K) (M/SEC) (METERS)
    ID
              CATS.
                                                                                                                BY
  KIMB_GEN
                   0.16254E+00 437265.7 4851610.5 1512.7
                                                                       812.25
                                                                                           48.77
                                                                3.66
                                                                                  0.00
                                                                                                     YES
                                 437008.0 4851993.5
                                                                                                      YES
                                 436870.7 4851715.0
  BOILER2
                    0.59724E+00
                                                    1490.5
                                                               24.38
                                                                        560.93
                                                                                  19.69
                                                                                           0.76
                                                                                                      YES
  BOILER4
                 0
                    0.11227E+01
                                 436890.2 4851715.5 1490.5
                                                               24.38
                                                                       560.93
                                                                                 23.05
                                                                                           0.97
                                                                                                      YES
                    0.11088E+00 436893.8 4851707.5 1490.5 0.11227E+01 436875.0 4851715.0 1490.5
                                                                       755.37
  GEN1
                 n
                                                               14.33
                                                                                 66.49
                                                                                           0.15
                                                                                                      YES
  BOILERS
                                                               24.38
                                                                       560.93
                                                                                 23.10
                                                                                           0.97
                                                                                                     YES
                                          *** SOURCE IDS DEFINING SOURCE GROUPS ***
GROUP ID
                                                         SOURCE IDS
           KIMB GEN, HART GEN, BOILER2 , BOILER4 , GEN1
                                                         , BOILER3 ,
 ALL
 KIMB_GEN
           KIMB GEN,
 HART GEN
           HART GEN,
 BOILER2
           BOILER2 ,
 BOILER4
           BOILER4 .
 GEN1
           GEN1
 BOILER3
           BOILER3 .
                                               *** THE SUMMARY OF HIGHEST 24-HR RESULTS ***
                                       ** CONC OF PM_10
                                                           IN MICROGRAMS/M**3
                                                     DATE
 NETWORK
 GROUP ID
                                 AVERAGE CONC
                                                  (YYMMDDHH)
                                                                         RECEPTOR (XR, YR, ZELEV, ZFLAG)
                                                                                                              OF TYPE
GRID-ID
         HIGH 1ST HIGH VALUE IS
                                      79.79086 ON 89031424: AT ( 436977.00, 4851764.00, 1493.61,
                                                                                                           0.00) DC
ALL
    NA
         HIGH 2ND HIGH VALUE IS
                                      73.03221 ON 90112724: AT ( 436977.00, 4851764.00, 1493.61,
                                                                                                           0.00) DC
    NΑ
         HIGH 6TH HIGH VALUE IS
                                      66.00025 ON 89061624: AT ( 436952.00, 4851764.00, 1493.22,
                                                                                                           0.00) DC
    NA
```

KIMB_GEN NA	HIGH	1ST HIGH	VALUE	IS	8.67735	ON	90112724: A	т (437477.00,	4851714.00,	1516.50,	0.00)	DC
	HIGH	2ND HIGH	VALUE	IS	7.80164c	ON	88051224: A	т (437327.00,	4851464.00,	1522.29,	0.00)	DC
NA	HIGH	6TH HIGH	VALUE	IS	6.77966	ON	89031424: A	т (437427.00,	4851664.00,	1517.20,	0.00}	DC
NA HART_GEN NA	HIGH	1ST HIGH	VALUE	IS	12.05293	ON	90011924: A	т (437027.00,	4852014.00,	1487.48,	0.00)	DC
	HIGH	2ND HIGH	VALUE	IS	10.96236	ON	91121924: A	т (437027.00,	4852014.00,	1487.48,	0.00)	DC
NA	HIGH	6TH HIGH	VALUE	IS	9.76675℃	ON	89011124: A	т (437027.00,	4852014.00,	1487.48,	0.00)	DC
NA BOILER2 NA	HIGH	1ST HIGH	VALUE	IS	16.19253	ON	90112124: A	т (436952.00,	4851789.00,	1491.90,	0.00)	DC
	HIGH	2ND HIGH	VALUE	IS	15.70320	ON	89022024: A	т (436952.00,	4851789.00,	1491.90,	0.00)	DC
NA	HIGH	6тн нісн	VALUE	IS	14.05912	ои	87021424: A) T.	436952.00,	4851764.00,	1493.22,	0.00)	DC
NA BOILER4 NA	HIGH	1ST HIGH	VALUE	IS	30.11375	ON	89031424: A	т (436977.00,	4851764.00,	1493.61,	0.00}	DC
-	HIGH	2ND HIGH	VALUE	IS	29.77310	ОИ	90112724: A	т (436977.00,	4851764.00,	1493.61,	0.00)	DC
NA	HIGH	6тн ні с н	VALUE	IS	25.16775	ОИ	87021424: A	T (436977.00,	4851764.00,	1493.61,	0.00)	DC
NA GEN1 NA	HIGH	1ST HIGH	VALUE	IS	24.16703c	ON	91013024: A	T (436852.03,	4851689.00,	1489.19,	0.00)	DC
	HIGH	2ND HIGH	VALUE	IS	21.10023c	ON	89020224: A	т (436877.00,	4851689.00,	1490.59,	0.00)	DC
NA	HIGH	6TH HIGH	VALUE	IS	19.18015	ON	89020324: A	т (436877.00,	4851689.00,	1490.59,	0.00)	DC
NA BOILER3 NA	HIGH	1ST HIGH	VALUE	IS	26.67056	ON	89031424: A	т (436977.00,	4851764.00,	1493.61,	0.00)	DC
	HIGH	2ND HIGH	VALUE	IS	24.17604	ON	89010624: A) T.	437002.00,	4851789.00,	1493.70,	0.00}	DC
NA NA	HIGH	6TH HIGH	VALUE	IS	21.18285	ON	87021424: A	T (436952.00,	4851764.00,	1493.22,	0.00)	DC

Example of Annual Analysis for PM₁₀

```
*** ISC3P - VERSION 99020 ***

*** BYU Max LT ER from Operating Permit BYUSTBACKDEQlt.BST 01/28/03 ***

*** Model Executed on 01/28/03 at 18:13:26 ***
```

Number of sources - 7
Number of source groups - 8
Number of receptors - 2728

BEE-Line ISC3P "BEEST" Version 8.10

*** POINT SOURCE DATA ***

	NUMBER	EMISSION RATE	3		BASE	STACK	STACK	STACK	STACK	BUILDING	EMISSION
RATE SOURCE	PART.	(GRAMS/SEC)	x	Y	ELEV.	HEIGHT	TEMP.	EXIT VEL.	DIAMETER	EXISTS	SCALAR
VARY ID	CATS.		(METERS)	(METERS)	(METERS)	(METERS)	(DEG.K)	(M/SEC)	(METERS)		BY
			-								
KIMB GEN	0	0.88200E-02	437265.7	4851610.5	1512.7	3.66	812.25	0.00	48.77	YES	
HART GEN	0	0.25200E-02	437008.0	4851993.5	1512.7	1.93	812.25	57.73	0.05	YES	
BOILER2	0	0.12474E+00	436870.7	4851715.0	1490.5	24.38	560.93	19.69	0.76	YES	
BOILER4	0	0.23474E+00	436890.3	4851715.5	1490.5	24.38	560.93	23.05	0.97	YES	
GEN1	Ō	0.63000E-02	436893.8	4851707.5	1490.5	14.33	755.37	66.49	0.15	YES	
BOILER3	Ď	0.23474E+00	436875.0	4851715.0	1490.5	24.38	560.93	23.10	0.97	YES	
BOILER5	ō	0.28489E+00	436898.0	4851716.0	1490.5	19.51	422.04	16.01	1.07	YES	

*** SOURCE IDS DEFINING SOURCE GROUPS ***

GROUP ID SOURCE IDS

```
ALL KIMB_GEN, HART_GEN, BOILER2, BOILER4, GEN1, BOILER3, BOILER5, KIMB_GEN, HART_GEN, BOILER2, BOILER2, BOILER2, BOILER4, GEN1, BOILER4, GEN1, GEN1, GEN1, BOILER4, GEN1, BOILER5, B
```

BOILER3 BOILER3 , BOILER5 BOILER5 ,

*** THE SUMMARY OF MAXIMUM PERIOD (8760 HRS) RESULTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3

ROUP ID		AVERAGE CONC	REC	EPTOR (XR, Y	R, ZELEV, ZFL	AG) OF TY	NETWORK PE GRID-ID
				· • •			
LL	1ST HIGHEST VALUE IS	5 4.94188 AT (436952.00,	4851764.00,	1493.22,		C NA
	2ND HIGHEST VALUE IS	4.57005 AT (436977.00,	4851764.00,			C NA
	3RD HIGHEST VALUE IS	4.53399 AT (436977.00,	4851789.00,			C NA
	4TH HIGHEST VALUE IS	3 4.41079 AT (436952.00,	4851789.00,	1491.90,	0.00)	
	5TH HIGHEST VALUE IS					, -	C NA
	6TH HIGHEST VALUE IS	4.10685 AT (437002.00,	4851814.00,	1493.00,	0.00) E	C NA
IMB GEN	1ST HIGHEST VALUE IS	0.08510 AT (437427.00,	4851664.00,	1517.20,	• -	C NA
	2ND HIGHEST VALUE IS	0.08337 AT (437477.00,		1516.50,	0.00) I	-
	3RD HIGHEST VALUE IS	0.06590 AT (437477.00,			0.00) E	
	4TH HIGHEST VALUE IS	0.05414 AT (C NA
	5TH HIGHEST VALUE IS	9 0.05076 AT (437577.00,				C NA
	6TH HIGHEST VALUE IS	0.04487 AT (437427.00,	4851614.00,	1519.89,	0.00) I	C NA
ART GEN	1ST HIGHEST VALUE IS	S 0.35464 AT (437027.00,	4852014.00,	1487.48,	0.00)	C NA
	2ND HIGHEST VALUE IS	0.10283 AT (436977.00,	4851914.00,	1487.91,		C NA
	3RD HIGHEST VALUE IS	S 0.10116 AT (437002.00,	4851914.00,	1489.41,	0.00) [C NA
	4TH HIGHEST VALUE IS	S 0.09341 AT (436952.00,	4851914.00,	1486.39,	0.00) [C NA
	5TH HIGHEST VALUE IS	S 0.09107 AT (437077.00,	4852014.00,	1489.01,	0.00) I	C NA
	6TH HIGHEST VALUE IS	S 0.07858 AT (437002.00,	4851889.00,	1490.69,	0.00) [C NA
DILER2	1ST HIGHEST VALUE IS	S 0.59295 AT (436952.00,	4851789.00,	1491.90,	0.00) I	C NA
	2ND HIGHEST VALUE IS	S 0.57069 AT (436952.00,	4851764.00,	1493.22,	0.00) I	C NA
	3RD HIGHEST VALUE I	S 0.56494 AT (436977.00,	4851789.00,	1492.70,	0.00)	C NA
	4TH HIGHEST VALUE IS	S 0.54713 AT (436977.00,	4851814.00,	1491.69,		C NA
	5TH HIGHEST VALUE IS	S 0.54144 AT (436927.00,	4851764.00,	1492.30,	0.00) [C NA
	6TH HIGHEST VALUE I	S 0.53522 AT (436952.00,	4851814.00,	1490.69,	0.00}	DC NA
OILER4	1ST HIGHEST VALUE I	S 1.23091 AT (436952.00,	4851764.00,	1493.22,	0.00) I	DC NA
	2ND HIGHEST VALUE I	S 1.17387 AT (436977.00,	4851764.00,	1493.61,	0.00) I	C NA
	3RD HIGHEST VALUE I		436977.00,	4851789.00,	1492.70,	0.00) I	DC NA
	4TH HIGHEST VALUE I		437002.00,	4851789.00,	1493.70,	0.00) I	DC NA
	5TH HIGHEST VALUE I		436952.00,	4851789.00,	1491.90,	0.00)	OC NA
	6TH HIGHEST VALUE I		437027.00,	4851789.00,	1494.50,	0.00) I	DC NA

*** THE SUMMARY OF MAXIMUM PERIOD (8760 HRS) RESULTS ***

**

** CONC OF PM_10 IN MICROGRAMS/M**3

GROUP II) 	AVERAGE CONC	REC	EPTOR (XR, YR	R, ZELEV, ZFLAG	OF :		TWORK ID-ID
-					1101 60	0.001	D a	NA
GEN1	1ST HIGHEST VALUE IS		436902.00,	4851739.00,	1491.60,	0.00)	DC DC	NA NA
	2ND HIGHEST VALUE IS	,	436927.00,		1493.00, 1490.20,	0.00)	DC	NA NA
	3RD HIGHEST VALUE IS			4851739.00,	1490.20,	0.00)	DC	NA NA
	4TH HIGHEST VALUE IS			4851764.00, 4851689.00,	1490.59,	0.00)	DC	NA
	5TH HIGHEST VALUE IS	•	436877.00,	4851764.00.	1490.99,	0.00)	DC	NA NA
	6TH HIGHEST VALUE IS	0.20623 AT (436902.00,	4651/64.00,	1430.33,	0.00)	DC	IVIT
BOILERS	1ST HIGHEST VALUE IS	0.75147 AT (436977.00.	4851789.00,	1492.70,	0.00}	DC	NA
	2ND HIGHEST VALUE IS	0.74131 AT (436952.00,	4851789.00,	1491.90,	0.00)	DC	NA
	3RD HIGHEST VALUE IS	0.73777 AT (436952.00,	4851764.00,	1493.22,	0.00)	DC	NA
	4TH HIGHEST VALUE IS	0 72029 AT (437002.00,	4851814.00,	1493.00,	0.00)	DC	NA
	5TH HIGHEST VALUE IS	0.71232 AT (437002.00.	4851789.00.	1493.70,	0.00)	DC	NA
	6TH HIGHEST VALUE 19	· ·	436977.00,	4851814.00,	1491.69,	0.00)	DC	NA
BOILER5	1ST HIGHEST VALUE IS	2.19768 AT (436952.00,	4851764.00,	1493.22,	0.00)	DC	NA
DOTELLA	2ND HIGHEST VALUE IS		436977.00,	4851764.00,	1493.61,	0.00)	DC	NA
	3RD HIGHEST VALUE IS		436977.00.	4851789.00.	1492.70,	0.00)	DC	NA
	4TH HIGHEST VALUE IS		437002.00.	4851789.00.	1493.70.	0.00)	DC	NA
	5TH HIGHEST VALUE IS		436952.00.	4851789.00,	1491.90.	0.00}	DC	NA
	6TH HIGHEST VALUE IS	•	437002.00.	4851764.00,	1494.10,	0.00)	DC	NA
	OIN MIGHEST VALUE IS	1.02100 AL (43,002.00,	4031/04.00,	7474.70,	0.00)		****